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14 Attorneys for Defendants
15 WELLS FARGO BANK, N.A. (erroneously sued as Wells Fargo Home Mortgage
16 and Wells Fargo Asset Securities Corporation) and U.S. BANK, NATIONAL
17 ASSOCIATION, as Trustee for WFMBS 2006-AR2

18 **UNITED STATES DISTRICT COURT**

19 **CENTRAL DISTRICT OF CALIFORNIA**

20 ANDREW CAMERON BAILEY,
21 CONSTANCE BAXTER MARLOW,

22 Plaintiffs,

23 vs.

24 U.S. BANK NA as Trustee for WFMBS
25 2006-AR2; WELLS FARGO BANK
26 NA; WELLS FARGO HOME
27 MORTGAGE; WELLS FARGO
28 ASSET SECURITIES
CORPORATION; LEHMAN
BROTHERS INC; and All Persons
Unknown, Claiming Any Legal or
Equitable Right, Title, Estate, Lien, Or
Interest in The Property Described in
The Complaint Adverse to Plaintiffs'
Title, Or Any Cloud On Plaintiffs' Title
Thereto; and JOHN DOES "1-10"
inclusive,

Defendants.

Case No. CV11-3227 GW (CWx)
Hon. George H. Wu
Ctrm. 10 - Spring St.

**DECLARATION OF JARLATH M.
CURRAN, II, IN SUPPORT OF
OPPOSITION TO PLAINTIFFS'
MOTION TO CONSOLIDATE**

**[Filed concurrently with Opposition
to Motion to Consolidate and Request
for Judicial Notice]**

Complaint Filed: April 15, 2011

DECLARATION OF JARLATH M. CURRAN, II

I, Jarlath M. Curran, declare:

1. I am a duly licensed attorney admitted to practice law in all of the courts in California. I am an associate with Severson & Werson, A Professional Corporation, attorneys for defendants WELLS FARGO BANK, N.A. (erroneously sued as Wells Fargo Home Mortgage and Wells Fargo Asset Securities Corporation) and U.S. BANK, NATIONAL ASSOCIATION, as Trustee for WFMBS 2006-AR2 ("Defendants") in this case.

2. As an attorney representing clients in California state and federal courts, I am generally aware of hourly rates charged by lawyers engaged in practices representing mortgage lenders. My hourly rate of \$250 is commensurate with hourly rates charged by those attorneys.

3. Based on my experience with this type of litigation, I believe that Defendants are likely to incur at least \$75,000 in attorney fees and costs in defending against plaintiffs' claims, which impact Defendants' rights under the subject loan and deed of trust.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Irvine, California this 24th day of May 2011.

By: /s/Jarlath M. Curran II
Jarlath M. Curran, II

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Irvine, California. My business address is Severson & Werson, 19100 Von Karman Avenue, Suite 700, Irvine, California 92612.

On the date below I served the within document(s) described as:
**DECLARATION OF JARLATH M. CURRAN, II, IN SUPPORT OF
OPPOSITION TO PLAINTIFFS' MOTION TO CONSOLIDATE**
on the interested parties in this action:

☒ by placing ☐ the original ☒ true copy(ies) thereof enclosed in sealed envelope(s) ☐ addressed as follows: ☐ address as stated on the attached mailing list.

Andrew Cameron Bailey
Constance Baxter Marlow
153 Western Avenue
Glendale CA 91201

Plaintiffs in pro per

☒ **BY MAIL (C.C.P. § 1013(a))** - I deposited such envelope(s) for processing in the mail room in our offices. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Irvine, California, in the ordinary course of business. I am aware that on motion of a party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☐ **(BY ELECTRONIC SERVICE)** Pursuant to CM/ECF System, registration as a CM/ECF user constitutes consent to electronic service through the Court's transmission facilities. The Court's CM/ECF system sends an e-mail notification of the filing to the parties and counsel of record listed above who are registered with the Court's EC/ECF system.

☒ **FEDERAL** - I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. Executed on May 23, 2011, at Irvine, California.

By: 
LINDA D. OWEN